

## Brooks, Becky

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**From:** Elizabeth O'Neal <oneale@socma.com>  
**Sent:** Friday, May 23, 2014 12:45 PM  
**To:** Stanislaus, Mathy  
**Cc:** Bill Erny; jamie@conradcounsel.com; Jennifer Gibson; Bill Allmond; Natarajan, Nitin; Brooks, Becky; Breen, Barry  
**Subject:** Leveraging Industry Stewardship Programs  
**Attachments:** ERSC Concept Paper.docx

Dear Assistant Administrator Stanislaus,

Thank you for your interest in working together on possibly leveraging the strength of our industry programs for our shared goals of chemical facility safety and security. Your responsiveness to our request for your ideas in writing is helpful for us as we try to facilitate these discussions within our respective trade associations – thank you! There are several good ideas here that may be workable, in fact, may be quite manageable, for us to partner together on, and though we have strong reservations about some aspects of these ideas, we definitely agree that it would be valuable to continue this conversation. If we could plan for a broader conversation together, and consider a path forward for how we could choose to include our respective memberships going forward, that would be helpful for all three of our organizations. The American Chemistry Council is willing to host an initial meeting to discuss this outreach idea, and SOCMA and NACD will join. Would you recommend some potential dates for this?

We are all in agreement that we'd like to continue this conversation, and in particular are interested in discussing what might be envisioned with regards to implementing some of these ideas with an EPCRA Revitalization Steering Committee, which our industry supports. Attached is our working concept paper.

These have been long months for you and your team, and all of the tri-chairs. Thank you for what you are doing to work with our industry, and for the continual effort you put forth in outreach to industry stakeholders. We look forward to your reply.

Best regards,  
Elizabeth

### C. Elizabeth O'Neal, MPA

Government Relations  
Chemical Safety and Security Policy  
Society of Chemical Manufacturers and Affiliates  
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**From:** Stanislaus, Mathy [mailto:Stanislaus.Mathy@epa.gov]  
**Sent:** Thursday, May 22, 2014 10:27 AM  
**To:** Elizabeth O'Neal  
**Cc:** Bill Erny; jamie@conradcounsel.com; Jennifer Gibson; Bill Allmond; Natarajan, Nitin; Brooks, Becky; Breen, Barry  
**Subject:** Re: Leveraging Industry Stewardship Programs for Common Goals of Chemical Facility Safety and Security

Elizabeth:

This is to followup on our last conversation and your e-mail and paper.

EPA agrees with the value and importance of chemical industry programs to improve and advance chemical safety. Given the number of chemical facilities nationwide and limited government resources, leveraging the initiatives of leading industry associations is an important component of advancing a consistent approach to chemical safety. We think the industry associations' role in sharing of best practices among participating companies, mentoring and company-to-company mutual assistance, dedicated workshops and conferences, and public recognition of best practices all have tremendous value.

Consistent with the paper and our conversation, to further these efforts and increase consistency in chemical safety programs aimed at industry, we propose a collaboration in the following areas:

Work with industry associations to broadly disseminate implementation guidance and other tools developed by industry association related to improving chemical safety.

Work with industry associations to reaffirm and clarify the roles and responsibilities of facilities under EPCRA, specifically in participating in the local emergency planning process, providing technical assistance in identifying and understanding chemical risks, and providing information to the local community.

Work with industry associations to facilitate discussion on key safety issues identified by individual companies and process safety professionals, identify actions to implement and advance safety in these areas, and gather input on modernizing our program using regulations, guidance, and advisories/alerts. Potential key issues include:

- Reporting, tracking and investigating near misses and upsets; safety performance measurement;
- Managing change practices and systems employed in the chemical industry;
- Building safety culture into the process industries;
- Strategies used by chemical facilities with local officials to address buffer zones and facility siting concerns and;
- Work to advance a clearinghouse of lessons learned/best practices;

Exploring opportunities to utilize third party audits of management systems for regulatory purposes. This would include examination of scope, conduct and structure of audits (e.g., independence, accreditation, ratings, disclosure), and its relationship to regulatory requirements.

Please let me know your interest in setting up a process to advance this.

Thanks again,

Mathy Stanislaus  
USEPA  
Assistant Administrator

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**From:** Elizabeth O'Neal <oneale@socma.com>

**Sent:** Thursday, May 15, 2014 3:42:24 PM

**To:** Stanislaus, Mathy; Stanton, Larry; Brooks, Becky; Natarajan, Nitin; Matthiessen, Craig

**Cc:** Bill Erny; Jamie Conrad; Jennifer Gibson; Bill Allmond

**Subject:** Leveraging Industry Stewardship Programs for Common Goals of Chemical Facility Safety and Security

Dear Assistant Administrator Stanislaus,

Thank you for taking the time to visit with us on the call today. This is the document we referenced on leveraging our industry stewardship programs to meet the common goals we share in improving chemical facility safety and security. We do share the concerns of the agency in reaching outliers that may not be in compliance with current regulations. SOCMA is hopeful that we could work together on some of the ideas we've posed here with NACD and ACC, and we look forward to your response on this document, as was discussed in our call this afternoon.

Thank you for your understanding on our timing needs – we each have multiple internal parties with whom we'd need to share your framework, when we receive it. I think we all wish that part could go faster!

We are understandably hesitant to support a focus on adding additional burdens on compliant facilities across the country.

We look forward to finding solutions together, particularly around compliance assistance with current regulations, and for working together to reach those who need more outreach and education.

Most importantly, thank you for the opportunity to discuss these ideas with you.

Best regards,

Elizabeth O'Neal

**C. Elizabeth O'Neal, MPA**

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[www.SpecialtyManufacturing.org](http://www.SpecialtyManufacturing.org)

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**Concept Paper  
for  
EPCRA Reinvigoration Steering Committee**

One of the clear messages heard in response to EO 13650 is that the state and local emergency planning process established in the late 1980s and early 1990s under the Emergency Planning and Community Right-to-Know Act (EPCRA) has faded away or become a mere formality in many areas – and may never have been fully established in others. No single initiative can do more to prevent and prepare for chemical emergencies than to reinvigorate the EPCRA planning process across the nation and throughout all relevant levels of government. This will be a nationwide effort involving facility owner/operators and all levels of government over many months. To be successful, it will require sustained coordination among the stakeholders to more fully identify the actions to be taken and to oversee their execution. This effort will partially fulfill two sections of the EO, Sections 3(a) (“Improving Operational Coordination with State, Local, and Tribal Partners”) and 7 (“Identification of Best Practices”).

**Suggested Structure**

*National Coordination.* Since the principal beneficiaries of this effort will be local emergency planning committees (LEPCs), fire departments and other local emergency response entities, the most natural home for an EPCRA Reinvigoration Steering Committee would be as a subcommittee or work group under the Emergency Services Sector Coordinating Council. The ESSCC encompasses both the emergency management and fire/emergency services disciplines. It is oriented toward both enhancing those functions and protecting the responders themselves, an issue highlighted by the West Fertilizer tragedy. The ESSCC’s Sector-Specific Plan<sup>1</sup> specifically recognizes the importance of coordination between the ESS and LEPCs. The ESSCC is not limited to security incidents, but is premised on an all-hazards perspective. Both EPA and DHS are involved with the ESSCC: DHS/IP is the Sector-Specific Agency, and EPA serves on its Government Coordinating Council (as do DHS/FEMA and DHS/Fire Administration, among others). The InterAgency Board is an advisory council to the ESSCC.

In addition to interested member associations of the ESSCC (e.g., the National Emergency Management Association and the International Association of Emergency Managers), the ERSC should include representation from:

- DOT/PHMSA
- The National Association of SARA Title III Program Officials
- Chemical industry associations, potentially including ACC, AFPM, ARA, NACD, SOCMA & the U.S. Chamber of Commerce
- Other stakeholders, as appropriate

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<sup>1</sup> <http://www.dhs.gov/xlibrary/assets/nipp-ssp-emergency-services.pdf> (p. 26).

Meetings of the ESSCC and its GSCC are already encompassed within the CIPAC framework. Other participants in the ERSC would be regarded as subject matter experts for CIPAC purposes.

*Regional Coordination.* Under EPCRA, LEPCs are overseen by State Emergency Response Commissions, and it is anticipated that the ERSC would interact primarily with SERCs rather than individual LEPCs. The thirteen Regional Response Teams organized under the National Contingency Plan represent an ideal intermediate level – and could play an important intermediary role – between the ERSC and the SERCs. They serve as planning and preparedness coordinating bodies. States are already represented on the RRTs by their emergency management or environmental agencies, and industry groups and other stakeholders have a history of participating as non-voting members of RRTs.

### **Potential Activities**

While the ERSC would be charged initially with further defining its role and desired activities, these would generally comprise (i) identifying or generating training materials, brochures and other work product that local government entities find to be useful and (ii) disseminating those materials online, via existing networks, and through specialized workshops or other events. The scale and timing of these activities would be substantially dependent upon the availability of Federal resources.

#### *Potential work products:*

- A statement regarding the baseline roles and responsibilities of facilities under EPCRA.
- Particularly successful examples of local emergency plans being developed and updated.
- Explanatory guides to the EPCRA process for facilities.
- Explanatory guides to the EPCRA process for local governments. These could include lists of questions to ask facilities.
- Plain-language guides regarding the requirements for release or protection of information under EPCRA.
- Successful ways of constituting an LEPC (where housed within local government, who staffs, how operated) and maintaining its membership.
- Best practices for LEPC interaction with local fire departments and other governmental entities.

- Plain-language explanations of potential hazards associated with response to emergencies involving ammonium nitrate and other chemicals that are commonly stored in large quantities.
- Tools for improving the ability of volunteer fire departments to access and understand EPCRA submissions by facilities.

*Potential dissemination tools:*

- Existing or new websites (e.g., the Internet-based data management system described in the multi-association letter to the President).
- Standing events (e.g., NASTTPO Annual Meeting)
- Regional events or workshops

**Brooks, Becky**

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**From:** Pam Guffain <PGuffain@tfi.org>  
**Sent:** Monday, May 19, 2014 1:04 PM  
**To:** Belke, Jim  
**Cc:** Stanislaus, Mathy  
**Subject:** LEPC and SERC

Jim,  
Can you send me a list of all LEPC's and SERC's. We would like to outreach to all them on our AN guidelines.

Thanks. Hope all is well with you

Pam

Pam Guffain  
The Fertilizer Institute  
425 Third Street, S.W., Suite 950  
Washington, D.C. 20024  
[REDACTED] – cell  
[pguffain@tfi.org](mailto:pguffain@tfi.org)



## Brooks, Becky

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**From:** Elizabeth O'Neal <oneale@socma.com>  
**Sent:** Thursday, May 15, 2014 3:42 PM  
**To:** Stanislaus, Mathy; Stanton, Larry; Brooks, Becky; Natarajan, Nitin; Matthiessen, Craig  
**Cc:** Bill Erny; Jamie Conrad; Jennifer Gibson; Bill Allmond  
**Subject:** Leveraging Industry Stewardship Programs for Common Goals of Chemical Facility Safety and Security  
**Attachments:** EO Industry Programs 4-14.docx  
**Importance:** High

Dear Assistant Administrator Stanislaus,

Thank you for taking the time to visit with us on the call today. This is the document we referenced on leveraging our industry stewardship programs to meet the common goals we share in improving chemical facility safety and security. We do share the concerns of the agency in reaching outliers that may not be in compliance with current regulations. SOCMA is hopeful that we could work together on some of the ideas we've posed here with NACD and ACC, and we look forward to your response on this document, as was discussed in our call this afternoon.

Thank you for your understanding on our timing needs – we each have multiple internal parties with whom we'd need to share your framework, when we receive it. I think we all wish that part could go faster!

We are understandably hesitant to support a focus on adding additional burdens on compliant facilities across the country.

We look forward to finding solutions together, particularly around compliance assistance with current regulations, and for working together to reach those who need more outreach and education.

Most importantly, thank you for the opportunity to discuss these ideas with you.

Best regards,  
Elizabeth O'Neal

### C. Elizabeth O'Neal, MPA

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## **Leveraging Industry Stewardship Programs to Enhance Chemical Facility Safety and Security**

The EO at multiple junctures recognizes that facility owners and operators play an indispensable role in reducing the safety and security risks associated with hazardous chemicals. For example:

- Section 3(a)(iv) notes how joint collaborative programs involving private sector partners and all levels of government can achieve a more comprehensive engagement in incident preparedness and response.
- Section 6(a)(i) highlights the role that private sector initiatives can play in modernizing options for facility safety and security.
- Section 7 is focused on identifying best practices and successes to date achieved by owners and operators.

More generally, given the number of chemical facilities nationwide and the limited nature of government resources, the EO can only be successful if it leverages, to the maximum extent possible, the voluntary initiatives of leading industry associations.

Several national chemical industry trade associations require their members to participate in comprehensive environmental, health, safety, and security programs as a condition of membership. Examples of these programs include the American Chemistry Council's Responsible Care<sup>®</sup>, the National Association of Chemical Distributors' Responsible Distribution<sup>®</sup>, and the Society of Chemical Manufacturers and Affiliates' ChemStewards<sup>®</sup> programs.

These initiatives require member companies to implement management systems to continuously improve their performance in such critical areas as product stewardship, emergency response and public preparedness, community outreach, handling and storage, and risk management. These programs share a variety of common elements ranging from mandatory performance reporting, to independent audits, to required implementation of Codes of Practices, to CEO-led governance processes, all of which were developed at the behest of the participating companies.

Because these industry programs represent the shared values of the participating companies and have been institutionalized through communal pressure and agreed-upon oversight mechanisms, they have succeeded in making risk reduction a top priority for each company that has adopted them. Also, because the program requirements are developed by consensus, have top company leadership support, and are adopted at all levels of each member company, they have instilled strong safety and security cultures within every participating company.

These industry programs have a positive impact on not only the safety and security postures of the participating companies, but also on their communities. Companies are required to inform emergency response officials, employees, customers and the public about both the hazards and benefits of chemicals and respond to the community's concerns. These companies also work with their stakeholders to communicate potential hazards and support product stewardship including handling, use, transportation, and disposal of chemical products. They connect with others in creating practices to help safeguard the community, workplace, and environment.

The programs support their focus on performance improvement through sharing of best practices among participating companies. Each program strongly emphasizes mentoring and company-to-company mutual assistance. Each association provides implementation resources such as manuals, dedicated workshops and conferences, and public recognition of best practices. Individual companies are expected to use this information to improve their own internal operations.

Finally, through their emphasis on safety and security performance, these industry stewardship programs complement and enhance participating companies' compliance with related regulations. In several cases, the industry programs' requirements exceed those of the regulations.

The IWG recommends that it engage actively with industry associations that have a demonstrated track record of implementing mature performance improvement initiatives. This engagement would have several aspects:

- Determining how to most broadly and effectively disseminate implementation guidance and other tools developed by such programs to the industry more broadly. This could involve websites, workshops and other means.
- Because the mutual assistance and 'peer pressure' aspects of these programs are most effective when companies belong to the relevant associations, creating incentives for association membership. Options that could be explored in this connection might involve agency reliance upon third party audits of management systems for regulatory purposes, consideration of membership as evidence of good faith efforts to comply, or different regulatory requirements for participants.
- Working with other industry associations to help them create and implement similar programs.

Working with industry associations to leverage their initiatives for improving environmental, health, safety, and security performance is consistent with the goals of the Executive Order to improve chemical facility safety and security and to share best practices. The IWG thus recommends a sustained and multifaceted engagement between IWG-member agencies and leading industry associations to establish a public/private partnership that leverages their environmental, health, safety, and security initiatives to further those goals.



## Brooks, Becky

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**From:** Jamie Conrad <jamie@conradcounsel.com>  
**Sent:** Monday, May 12, 2014 9:35 AM  
**To:** Stanislaus, Mathy  
**Cc:** Natarajan, Nitin; Breen, Barry; Brooks, Becky  
**Subject:** Re: Followup  
**Attachments:** James W. Conrad Jr..vcf; ATT00001.txt

Thanks so much for getting in touch with me about this idea.

I think the most promising approach for getting this idea off the ground would be to have a meeting, or at least a call, with representatives of the three trade associations whose performance improvement programs include an auditing component: ACC, NACD and SOCMA. If they were on board, it might fly. If they weren't, I think it probably won't. I could forward your note to them and see when might be a good time to meet or talk.

-- Jamie

James W. Conrad, Jr.  
Conrad Law & Policy Counsel  
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Washington, DC 20005-2242  
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202-822-1971 (fax)  
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jamie@conradcounsel.com  
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Note: Emails that I forward sometimes show up as attachments, esp. if recipients are using Outlook.



## Brooks, Becky

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**From:** Clark Mica <cmica@tfi.org>  
**Sent:** Friday, May 09, 2014 9:24 AM  
**To:** Spurlin, Steve  
**Cc:** Stanislaus, Mathy; Brooks, Becky  
**Subject:** Thank You

Dear Steve,

I wanted to thank you for taking the time from your busy schedule to travel to Nashville, TN to tour the AN river terminal and fertilizer warehouse. I hope that you found the tour to be educational and useful. If you have any questions or would like additional information about anything that was seen or discussed, please do not hesitate to contact me.

Thanks again for your time, we really appreciate it.

Best Regards,

Clark

J. Clark Mica  
Vice President, Government Relations  
The Fertilizer Institute  
425 Third Street, SW Suite 950  
Washington, D.C. 20024  
Tel (202) 515-2725  
Fax (202) 962-0577

## Brooks, Becky

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**From:** Brooks, Becky  
**Sent:** Monday, May 05, 2014 7:12 AM  
**To:** Clark Mica; 'Allen, Lora'; Livingston, Crishemma (CTR); Hunziker, Ann; CFATS; Smith, Sabrina M; 'Wanko, Jeffrey - OSHA'; amconville@ceq.eop.gov; 'Graydon, Amy'; Stanislaus, Mathy; Belke, Jim  
**Subject:** RE: AN Facility Site Visits in Nashville, TN

Steve Spurlin of EPA Region 4 will be in attendance.

*Becky Brooks  
Special Assistant  
Office of Solid Waste and Emergency Response  
U.S. Environmental Protection Agency  
ph. 202-566-2762*

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**From:** Clark Mica [mailto:cmica@tfi.org]  
**Sent:** Friday, May 02, 2014 11:59 AM  
**To:** 'Allen, Lora'; Livingston, Crishemma (CTR); Hunziker, Ann; CFATS; Smith, Sabrina M; 'Wanko, Jeffrey - OSHA'; Brooks, Becky; amconville@ceq.eop.gov; 'Graydon, Amy'; Stanislaus, Mathy; Belke, Jim  
**Subject:** AN Facility Site Visits in Nashville, TN

Dear All,

Attached please find the final agenda for the AN facility tour on Wednesday, May 7 in Nashville, Tennessee. Please do not hesitate to contact me if you have any questions. We look forward to seeing you next week.

Best Regards,

Clark

J. Clark Mica  
Vice President, Government Relations  
The Fertilizer Institute  
425 Third Street, SW Suite 950  
Washington, D.C. 20024  
Tel (202) 515-2725  
Fax (202) 962-0577

## Brooks, Becky

---

**From:** Clark Mica <cmica@tfi.org>  
**Sent:** Friday, May 02, 2014 11:59 AM  
**To:** 'Allen, Lora'; Livingston, Crishemma (CTR); Hunziker, Ann; CFATS; Smith, Sabrina M; 'Wanko, Jeffrey - OSHA'; Brooks, Becky; amconville@ceq.eop.gov; 'Graydon, Amy'; Stanislaus, Mathy; Belke, Jim  
**Subject:** AN Facility Site Visits in Nashville, TN  
**Attachments:** EO Workgroup Tour Agenda Final.pdf

Dear All,

Attached please find the final agenda for the AN facility tour on Wednesday, May 7 in Nashville, Tennessee. Please do not hesitate to contact me if you have any questions. We look forward to seeing you next week.

Best Regards,

Clark

J. Clark Mica  
Vice President, Government Relations  
The Fertilizer Institute  
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# *The* Fertilizer Institute

Nourish, Replenish, Grow

**Executive Order 13650 Working Group Site Tour  
Nashville, Tennessee  
May 7, 2014**

**Agenda**

**10:30a.m.-** Hunter Marine Terminal  
**11:30a.m.** TFC-ADI-Nashville  
6615 Robertson Avenue  
Nashville, TN 37209  
Facility Contact: (615) 356-9113

Stop includes a tour of the facility constructed of concrete with a wooden roof, an overview of regulatory requirements, and a discussion of safety and security best management practices.

Lunch will be on your own en route to Dickson, TN. A list of recommendations will be provided.

**1:00p.m. -** Dickson Farmers Fertilizer Co-op  
**2:00p.m.** 2161 Tennessee 48N (Note the actual address is 2157 but Google Maps will not work with that address so please use 2161)  
Dickson, TN 37055  
Facility Contact: (615) 446-2343

Stop includes a tour of the facility which is an all wood structure, an overview of regulatory requirements and a discussion of safety and security best management practices.

**Additional Contacts:**

Clark Mica  
Vice President of Government Relations  
The Fertilizer Institute  
Cell [REDACTED]

Randy Crowell  
Director of Environment, Health and Safety  
Tennessee Farmers Cooperative  
Cell [REDACTED]

## Brooks, Becky

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**From:** Jennifer Gibson <JGibson@NACD.com>  
**Sent:** Thursday, May 01, 2014 2:19 PM  
**To:** Stanislaus, Mathy; Mike Lang  
**Cc:** Brooks, Becky  
**Subject:** RE: Today's meeting

Mathy,

We are sorry that you were not able to be at our meeting in person today. Thank you for joining us on the phone and for coordinating the meeting. I thought that we had an excellent discussion. We look forward to continuing to work with you and the EO Working Group team on the issues we discussed.

I hope you are successfully recovering from your flooding issues. You are not alone - I also have some issues as do two other colleagues in my office!

Best regards,

Jennifer

Jennifer C. Gibson  
Vice President, Regulatory Affairs  
National Association of Chemical Distributors  
1560 Wilson Blvd., Suite 1100  
Arlington, VA 22209  
703.527.6223 x 3047 - Main Line  
703.527.7747 - Fax  
[REDACTED] - Direct  
jgibson@nacd.com

-----Original Message-----

**From:** Stanislaus, Mathy [mailto:Stanislaus.Mathy@epa.gov]  
**Sent:** Thursday, May 01, 2014 9:35 AM  
**To:** Mike Lang; Jennifer Gibson  
**Cc:** Brooks, Becky  
**Subject:** Today's meeting

Mike, Jennifer: I apologize but I cannot be at the meeting in person today. I will be on the phone. My staff will be there in person, and we'll have other agencies there as well. I'm dealing with some home issues -

Mathy.

## Brooks, Becky

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**From:** Mike Lang <MLang@NACD.com>  
**Sent:** Thursday, May 01, 2014 9:40 AM  
**To:** Stanislaus, Mathy; Jennifer Gibson  
**Cc:** Brooks, Becky  
**Subject:** RE: Today's meeting

Thank you letting us know. We really appreciate your time and assistance in coordinating this meeting.

Best Regards,

Mike

-----Original Message-----

From: Stanislaus, Mathy [mailto:Stanislaus.Mathy@epa.gov]  
Sent: Thursday, May 01, 2014 9:35 AM  
To: Mike Lang; Jennifer Gibson  
Cc: Brooks, Becky  
Subject: Today's meeting

Mike, Jennifer: I apologize but I cannot be at the meeting in person today. I will be on the phone. My staff will be there in person, and we'll have other agencies there as well. I'm dealing with some home issues -

Mathy.